



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX  
75 Hawthorne Street  
San Francisco, CA 94105  
SFD 8-3

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ALAMEDA POINT  
SSIC NO. 5090.3

May 11, 2005

Thomas Macchiarella  
BRAC Operations, Code 06CA.TM  
Department of the Navy, Southwest Division  
Naval Facilities Engineering Command  
1230 Columbia Street, Suite 1100  
San Diego, CA 92101

**RE: Draft Addendum to the Feasibility Study Report Installation Restoration Site 14,  
Alameda Point**

Dear Mr Macchiarella:

On March 2, 2005, the Navy submitted an Addendum to the Feasibility Study Report for Site 14. The explanation given for this submission was "the Navy's determination that the exposure pathway involving ingestion of groundwater by potential future residents at Site 14 is incomplete," recent groundwater sampling, and revision to the models used for evaluation of natural degradation rates of chlorinated hydrocarbon concentrations in the groundwater. The original draft final FS was submitted to EPA in March 2003 and became final in April 2003 as no dispute was filed.

Under Section 10.10 of the Alameda FFA, modification of a final primary document is appropriate only if new information (i.e., information that became available, or conditions that became known, after the document was finalized) makes the requested modification necessary. EPA is troubled by the "Addendum" because of the changes that were made from the original FS. If the Addendum were to replace the 2003 final FS, it would seriously reduce the amount of information that would be available to the Navy, regulators, and public during the remedy selection process. Specifically, the Addendum removes the ingestion pathway from the risk assessment calculations, removes protection of future residents through the ingestion pathway from the remedial action objective, and removes many remediation alternatives. None of these changes appear to be predicated on new information.

EPA does not believe that this document meets the FFA requirements for modification of a final document. However, we consider it appropriate to treat the Site 14 Addendum as a supplement to the original Feasibility Study. Therefore, the risk assessment results, the RAOs, and the remediation alternatives described in both the Final Feasibility Study for Site 14 and in the

Addendum will be factored into the selection of the most appropriate remedy. Thus we are considering both RAOs that meet MCLs and RAOs that are protective of the inhalation pathway to be options for remedial action. Furthermore, we consider the three remedial alternatives<sup>7</sup> presented in the Addendum to be additional alternatives to those presented in the Final Feasibility Study of April 2003. EPA feels that, when used together, both documents cover an appropriate range of proposed RAOs and contain a sufficient evaluation of various remedial alternatives to move to the Proposed Plan.

In reviewing the RAOs and the remedial alternatives in the Addendum, EPA's primary concerns are 1) that the remedy selected to treat vinyl chloride to the proposed RAO of 15 µg/l be also capable of treating the other groundwater contaminants (PCE and DCE) to a level close to the MCL in a reasonable timeframe, and 2) that any remedy that does not result in groundwater concentrations being remediated to MCLs needs to include institutional controls to protect against consumption of the groundwater. It may be necessary for the ICs to prohibit residential use of the property, as we have urged at other sites, although at Site 14 it may also be possible to fashion a remedy under which residential use of the property can be allowed if the groundwater is remediated to PRGs that adequately address both the inhalation and the accidental ingestion pathway. While we continue to believe that MCLs should be included as ARARs for this Class II groundwater, we may be willing to agree to disagree in a ROD if adequate groundwater cleanup takes place.

We do not believe it would be useful to revise and resubmit this Addendum as a draft final document, and instead recommend that the Navy add this letter, and any other letters or comments from other parties, to the Addendum, finalize it, and factor the information in the letters and comments into the Proposed Plan and Record of Decision for Site 14. We look forward to moving into the Proposed Plan stage and working together to select a reasonable, protective remedy for this site.

Sincerely,



Anna-Marie Cook  
Remedial Project Manager

cc list: Glenna Clark, SWDiv  
Marcia Liao, DTSC  
Judy Huang, RWQCB  
Elizabeth Johnson, City of Alameda  
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